



NORLITE CORPORATION

628 SO. SARATOGA STREET
PO BOX 684
COHOES, NY 12047
PHONE: (518) 235-0401
FAX: (518) 235-0233

September 19, 2012

Karen M. Gaidasz, CPESC
Environmental Analyst
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 08/29/12- 09/17/12
Kiln 2: 08/29/12- 09/17/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 08/29/12 thru 09/17/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the exceedances were a result of the 1 second time delay cutoff limit of -0.00 inches of water column associated with the negative backend chamber pressure. The majority of the cutoffs were found to be caused by controlling LGF Flow with valves and having high LGF Line pressure. The high LGF line pressure made finite control with the valve very difficult. Most of the cutoffs were results of a pressure pulse in the kiln system which was a result of a sudden LGF fuel surge caused by minute valve changes. Norlite attempted to reduce the overall LGF Line pressure to improve the LGF handling effectiveness.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically. Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvancouver@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager
Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4w/attachments
Tita LaGrimas, Tradebe w/attachments

DCL: 2410



NORLITE CORPORATION
 MACT EXCEEDANCE REPORT - KILN 1
 08/29/12 - 09/17/12

| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------|----------|----------|-----|-------------|---|---------------------------------------|-------|--|
| 9/1/2012 | 2:14:40 | 9/1/2012 | 2:16:01 | 0:01:21 | 121 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/8/2012 | 10:34:40 | 9/8/2012 | 10:36:38 | 0:01:58 | 122 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/10/2012 | 13:10:48 | 9/10/2012 | 13:12:35 | 0:01:47 | 123 | Malfunction | Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Span | LGF Flow | Span | Adjusted Fuel Flow |
| 9/11/2012 | 18:29:18 | 9/11/2012 | 18:52:31 | 0:23:13 | 124 | Malfunction | End of Burn Tank Was Reached Which Caused a Pressure Pulse in the Kiln System Due to the Loss of Flame. The Pressure Pulse Affected the Rear Chamber System | Back Chamber Pressure, 1 Second Delay | Opl | Switched Tanks and Reestablished Fuel Flow |
| 9/13/2012 | 12:42:40 | 9/13/2012 | 12:43:47 | 0:01:07 | 125 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/15/2012 | 1:15:05 | 9/15/2012 | 1:15:33 | 0:00:28 | 126 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/15/2012 | 1:16:09 | 9/15/2012 | 1:16:42 | 0:00:33 | 127 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |



NORLITE CORPORATION
 MACT EXCEEDNACE REPORT - KILN 2
 08/29/12 - 09/17/12

| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------|----------|----------|-----|-------------|--|---------------------------------------|-------|---|
| 9/1/2012 | 0:16:31 | 9/1/2012 | 0:17:06 | 0:00:35 | 316 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/1/2012 | 0:43:15 | 9/1/2012 | 0:44:00 | 0:00:45 | 317 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/4/2012 | 17:22:21 | 9/4/2012 | 17:22:51 | 0:00:30 | 318 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span | LGF Flow | Span | Adjusted Fuel Flow |
| 9/6/2012 | 21:52:00 | 9/6/2012 | 21:58:59 | 0:06:59 | 319 | Malfunction | The Operator Went Off LGF To Stop A Kiln Pressure Cutoff From Occurring. The Sudden Stop of LGF Flow Caused A Pressure Pulse In the Kiln System Which Caused A Rear Chamber Pressure Cutoff | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/7/2012 | 4:13:57 | 9/7/2012 | 4:14:17 | 0:00:20 | 320 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/8/2012 | 2:51:10 | 9/8/2012 | 2:51:58 | 0:00:48 | 321 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/10/2012 | 13:11:42 | 9/10/2012 | 13:12:02 | 0:00:20 | 322 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/11/2012 | 3:55:39 | 9/11/2012 | 3:56:56 | 0:01:17 | 323 | Malfunction | Kiln Operator Was Attempting to Re-establish LGF Fuel Flow After A Tank Switch. The LGF Line Pressure Was High Due to the Tank Switch Which Made Fine Control With A Valve Difficult Which Resulted In A Pressure Pulse In the Kiln System | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |

| | | | | | | | | | | |
|-----------|----------|-----------|----------|---------|-----|-------------|---|---------------------------------------|-----|---|
| 9/12/2012 | 2:13:50 | 9/12/2012 | 2:14:28 | 0:00:38 | 324 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/12/2012 | 16:45:36 | 9/12/2012 | 16:49:16 | 0:03:40 | 325 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/13/2012 | 0:14:59 | 9/13/2012 | 0:15:28 | 0:00:29 | 326 | Malfunction | Kiln Operator Was Attempting to Re-establish LGF Fuel Flow With A Valve Which Resulted In A Pressure Pulse In the Kiln System | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/13/2012 | 0:52:58 | 9/13/2012 | 0:53:41 | 0:00:43 | 327 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/13/2012 | 1:06:45 | 9/13/2012 | 1:13:52 | 0:07:07 | 328 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |
| 9/15/2012 | 6:18:38 | 9/15/2012 | 6:19:17 | 0:00:39 | 329 | Malfunction | The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Line Pressure and LGF Flow |